

CALFRESH (CF) PROGRAM

REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 8/5/16	NEED RESPONSE BY: 8/25/16
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Contra Costa County	
3. PHONE NO.:	7. SUBJECT: Shelter costs	
4. REGULATION CITE(S): MPP 63-502.36 MPP 63-403.25	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s).	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

client reported change in shelter costs but due to her limited income the landlord has worked out an arrangement with her allowing to meet the rent increase from \$750 to \$1300 but increasing the rent by \$10.00 every month until the \$550 difference is reached. the client has provided verification from the Landlord and also verification of payment showing \$10.00 increase over a 3 month period.

How do we budget this rent increase over this 55 month period and are we required to do so?

10. REQUESTOR'S PROPOSED ANSWER:

Unknown or

can we use $750 \times 12 = 9000$ and add the \$780 (the difference she pay during the year based on the increase) and add that to the \$9000 which is $\$9780/12 = \815 .

If we are to anticipate what she will pay at the end of the year we could use this calculation as she will pay a total of \$9780 and average this to allow her the \$815 monthly rental from the 1st month forward. AS this will total up to \$815 for the year certification period.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

Per 7 CFR 273.10(d)(2) "a deduction shall be allowed only in the month the expense is billed or otherwise becomes due, regardless of when the household intends to pay the expense. For example, rent which is due each month shall be included in the household's shelter costs, even if the household has not yet paid the expense." The CWDs should consider the actual cost which in the above scenario is, \$1300 for the budgeting purpose.

FOR CDSS USE

DATE RECEIVED: 8/5/16	DATE RESPONDED TO COUNTY/ALJ: SV 08-24-2016
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